

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

PHILIP MORRIS USA INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:15-cv-577
)	
AMERICAN ACCESSORIES)	
INTERNATIONAL, L.L.C.,)	
)	
Defendant.)	
)	

**DISCOVERY DESIGNATIONS OF
AMERICAN ACCESSORIES INTERNATIONAL, L.L.C.**

American Accessories International, L.L.C. (“AAI”), by counsel, submits the following designations of discovery that AAI intends to use at trial:

1. Plaintiff’s Answers to AAI’s First Set of Interrogatories;
2. Plaintiff’s Answers to AAI’s Second Set of Interrogatories;
3. Plaintiff’s Responses to AAI’s Requests for Documents;
4. Plaintiff’s Privilege Log;
5. Any and all discovery materials identified by Plaintiff in its discovery designations.
6. The following deposition testimony of Molly Arwood:

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Page 15:17 – 19
Page 16:5 – 10
Page 18:20 – 24
Page 19:18 – 23
Page 20:11 – 14
Page 25:1 – 4
Page 25:8 – 16
Page 25:20 – Page 26:7
Page 36:11 – 16
Page 36:23 – Page 37:1

Page 44:14 – 19
Page 60:1 – Page 61:4
Page 62:19 – 25
Page 65:12 – 16

7. The following deposition testimony of Scott Edson:

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Page 11:5 – 8
Page 22:4 – 12
Page 31:2 – 6
Page 52:3 – Page 53:24
Page 60:2 – Page 63:1
Page 74:22 – Page 75:2
Page 75:18 – Page 76:24
Page 89:23 – Page 90:4
Page 90:15 – Page 91:8
Page 100:16 – Page 102:6
Page 105:13 – Page 106:10

8. The following deposition testimony of Michael Sieja:

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Page 14:11 – 19
Page 15:3 – 5
Page 16:9 – 12
Page 22:9 – 12
Page 40:10 – Page 41:20
Page 45:7 – Page 52:3
Page 62:15 – Page 63:5
Page 65:8 – 21
Page 86:5 – 87:21

9. The following deposition testimony of Jill Smith:

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Page 23:13 – Page 24:17
Page 26:25 – Page 27:11
Page 29:1 – 10
Page 40:22 – 25
Page 41: 7 – 17
Page 41: 21 – Page 42:3
Page 74:5 – Page 78:8
Page 78:17 – Page 79:7
Page 79:14 – Page 82:21
Page 83:2 – 20
Page 84:25 – Page 85:4

Page 103:9 – 15
Page 107:5 – 21
Page 119:18 – Page 120:7
Page 150:5 – Page 152:10

10. The following deposition testimony of Kathryn Simers:

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Page 17:5 – Page 19:14
Page 34:1 – Page 35:9
Page 40:20 – 23
Page 42:18 – 21
Page 43:23 – Page 44:3
Page 54:20 – Page 56:3
Page 70:18 – 21

11. The following deposition testimony of David Zeanah:

Page 32:22 – Page 33:19
Page 125:12 – Page 126:2
Page 130:16 – Page 131:6
Page 134:10 – 24
Page 168:21 – Page 169:8
Page 186:6 – 14

12. The following deposition testimony of Eric Zeanah:

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Page 185:24 – Page 186:22
Page 221:22 – Page 223:1

13. By agreement of the parties, AAI will take the deposition of Eric Rubel on June 23, 2016. AAI reserves the right to designate portions of the testimony of Mr. Rubel.

14. PM USA has stated that it is likely to call David Anderson, Rick Clements, KC Crosthwaite, Diane Pinkney and Michelle Pope as live witnesses at trial. By agreement of the parties, because these witnesses are likely to testify live at trial, (a) AAI will not designate any deposition testimony for these witnesses at this time; (b) if PM USA later elects not to call any of these witnesses at trial, it will give prompt notice to AAI; and (c) upon such notice, AAI will then designate deposition testimony of those witnesses.

Dated: June 17, 2016

Respectfully submitted,

/s/ J. Andrew Keyes

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CERTIFICATE OF SERVICE

I hereby certify that on the seventeenth day of June, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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